

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 1:18-cv-12058-RGS

ROGER KNOX, WINTERCAP SA,  
MICHAEL T. GASTAUER, WB21 US  
INC., SILVERTON SA INC., WB21 NA  
INC., C CAPITAL CORP., WINTERCAP  
SA INC. AND B2 CAP INC.

Defendants,

and

RAIMUND GASTAUER, SIMONE  
GASTAUER FOEHR, B21 LTD., SHAMAL  
INTERNATIONAL FZE, AND WB21 DMCC

Relief Defendants.

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**DEFENDANT MICHAEL T. GASTAUER'S  
ASSENTED-TO MOTION TO AMEND PRELIMINARY INJUNCTION**

Defendant Michael T. Gastauer, by and through undersigned counsel, with the assent of Plaintiff Securities and Exchange Commission, respectfully moves the Court to enter the attached Stipulation and Order. The Order amends the previously-entered Preliminary Injunction, Asset Freeze, and Order for Other Equitable Relief (Dkt. #57) by authorizing Mr. Gastauer to use \$25,000 of funds held in trust for him by the law firm of Quinn Emanuel Urquhart & Sullivan LLP ("Quinn Emanuel") to pay legal fees in connection with his ongoing efforts to settle this matter.

Respectfully submitted,

/s/ William D. Weinreb

William D. Weinreb (BBO #557826)

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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2021, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. A copy will also be sent via first class mail and/or email to those parties who have not yet registered for notice via the Court's CM/ECF system.

/s/ William D. Weinreb

William D. Weinreb